



CHALOS & Co, P.C.
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February 29, 2024

Via Electronic Filing

Honorable J. Paul Oetken
Thurgood Marshall United States Courthouse
Room 2101
40 Foley Square
New York, New York 10007

This case is hereby STAYED during the pendency of the foreign arbitration proceeding. The parties are directed to file a joint status letter on or before September 1, 2024, and every six months thereafter.

So ordered.
3/1/2024

A handwritten signature in blue ink, appearing to read 'J. Paul Oetken', is written over a horizontal line.
J. PAUL OETKEN
United States District Judge

Re: Bertling Bulk Services, Pte, Ltd. v. Cofco International Freight S.A.
Case No. 1:22-CV-06350 (JPO)

Dear Judge Oetken –

Plaintiff Bertling Bulk Services, Pte, Ltd. (hereinafter “Plaintiff”), by and through undersigned counsel, respectfully submits this Joint Status Report on behalf of Plaintiff and Defendant Cofco International Freight S.A. On February 22, 2024, the Financial Unit Clerk for the Southern District of New York deposited the check for Plaintiff’s countersecurity in the amount of \$473,167.00 into the Court Registry. A copy of the receipt is enclosed.

Arbitration remains ongoing in London. The parties respectfully move this Court to administratively stay the present action during the pendency of the foreign arbitration. *See, e.g., Sembawang Shipyard, Ltd. v. Charger, Inc.*, 955 F.2d 983, 985 (5th Cir. 1992)(citing with approval the district court’s entry of stay of the Rule B attachment action pending arbitration); *Cordoba Shipping Co. v. Maro Shipping, Ltd.*, 494 F. Supp. 183 (D. Conn. 1980) (district court granted stay pending arbitration following attachment of funds pursuant to Rule B order of attachment). The matter shall be subject to reopening by either party, upon a showing of good cause. The parties recommend status reports on the underlying arbitration proceedings be provided to the Court every 180 days.

In advance, we thank the Court for its attention and assistance in this matter.

Respectfully submitted,

Chalos & Co, P.C.

A handwritten signature in black ink, appearing to read 'B. Sparkman', is written over a horizontal line.

Briton P. Sparkman
George M. Chalos



CHALOS & Co, P.C.
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cc: **Via ECF**

Peter J. Gutowski, Esq.
Counsel for Defendant

U.S. District Court

New York Southern - Manhattan

Receipt Date: Feb 22, 2024 3:38PM

BERTLING BULK SERVICES PTE, LTD.

Rcpt. No: 26678

Trans. Date: Feb 22, 2024 3:38PM

Cashier ID: #SS

CD	Purpose	Case/Party/Defendant	Qty	Price	Amt
701	Treasury Registry	DNYS122CV006350 /001 BERTLING BULK SERVICES PTE, LTD.	1	473167.00	473167.00

CD	Tender			Amt
CH	Check	#1219	02/22/2024	\$473,167.00
Total Due Prior to Payment:				\$473,167.00
Total Tendered:				\$473,167.00
Total Cash Received:				\$0.00
Cash Change Amount:				\$0.00

Only when the bank clears the check, money order, or verifies credit of funds, is the fee or debt officially paid or discharged. A \$53 fee will be charged for a returned check.